

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

vs.

SHAKAYLA LORRENE TUCKER,

Defendant.

INDICTMENT

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The Grand Jury charges:

COUNTS 1-8
(Wire Fraud)

Between on or about March 22, 2021 and on or about September 13, 2021, in Berrien County, in the Southern Division of the Western District of Michigan,

SHAKAYLA LORRENE TUCKER,

having knowingly devised a scheme and artifice to defraud, and to obtain money by means of false and fraudulent pretenses and representations, caused signs, sounds, and signals to be transmitted by wire in interstate commerce for the purpose of executing the scheme.

The defendant electronically submitted Paycheck Protection Program (PPP) loan applications and supporting documents for “Shakayla Tucker,” a fictitious sole proprietorship, which resulted in the transfer of \$20,832 in first-draw loan proceeds from Capital Plus Financial LLC (“Capital Plus”), a community development financial institution in Texas, and the transfer of \$20,832 in second-draw loan

proceeds from Prestamos CDFI LLC (“Prestamos”), a community development financial institution in Arizona, to an account controlled by the defendant in Michigan.

The defendant reported fictitious income and expenses to qualify for the loans, and certified that she would use the funds only for business related purposes as authorized by PPP, when in fact, she spent the money on personal goods and services. She then falsely certified that she had spent 100% of her first draw loan on payroll costs, to induce the SBA to forgive her loan and repay Capital Plus on her behalf.

For the purpose of executing the scheme and artifice, the defendant knowingly and intentionally transmitted, and caused to be transmitted, by means of wire communications in interstate commerce the following writings, signs, signals, pictures, and sounds:

COUNT	DATE	DESCRIPTION
1	March 22, 2021	Borrower’s application to SBA for PPP first draw loan no. 8288178610.
2	March 29, 2021	Lender’s application by Capital Plus to SBA for PPP first draw loan no. 8288178610.
3	April 2, 2021	Deposit of PPP first draw loan disbursement from Capital Plus for loan no. 8288178610, in amount \$20,832, to defendant’s PNC Bank account ending in 4596.
4	April 24, 2021	Borrower’s application to SBA for PPP second draw loan no. 1240699009.
5	April 24, 2021	Lender’s application by Prestamos to SBA for PPP second draw loan no. 1240699009.
6	May 28, 2021	Deposit of PPP second draw loan disbursement from Prestamos, in amount \$20,832, to defendant’s PNC Bank account ending in 4596.
7	September 6, 2021	Application to SBA for loan forgiveness for PPP first draw loan no. 8288178610.

8	September 13, 2021	Transfer of \$20,832 from SBA to Capital Plus in repayment of PPP first draw loan no. 8288178610.
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18 U.S.C. § 1343

COUNTS 9-12
(Wire Fraud)

Between on or about November 28, 2020 and on or about February 1, 2022, in Berrien County, in the Southern Division of the Western District of Michigan, and elsewhere,

SHAKAYLA LORRENE TUCKER,

having devised a scheme and artifice to defraud, and to obtain money by means of false and fraudulent pretenses and representations, caused signs, sounds, and signals to be transmitted by wire in interstate commerce for the purpose of executing the scheme.

The defendant electronically submitted an initial application and weekly claims for Unemployment Insurance (UI) benefits to the Indiana Department of Workforce Development (IDWD), and thereby caused IDWD to deposit approximately \$32,175 to an account she controlled. The defendant falsely represented that she had been laid off by an employer in Indiana due to the COVID pandemic, when in fact she had never worked for that employer.

The defendant also failed to disclose that she was already receiving UI payments at the same time from the Michigan Unemployment Insurance Agency (UIA). When IDWD suspended her benefits and sent her a notice of overpayment, the defendant appealed, and falsely represented that she had never filed for UI in any other state.

For the purpose of executing the scheme and artifice, the defendant knowingly and intentionally transmitted, and caused to be transmitted, by means of wire communication in interstate commerce the following writings, signs, signals, pictures, and sounds:

COUNT	DATE	DESCRIPTION
9	November 28, 2020	Application for Indiana UI benefits, claim no. 91498392.
10	November 15, 2021	Two letters faxed to Indiana DWD appealing suspension of UI benefits.
11	November 30, 2021	Deposit of \$24,244 lump sum Indiana UI benefits for claim no. 914983392 to defendant's Bancorp Bank account ending in 4673.
12	February 1, 2022	Deposit of \$3,143 lump sum Indiana UI benefits for claim no. 914983392 to defendant's Bancorp Bank account ending in 4673.

18 U.S.C. § 1343

A TRUE BILL

[/s/ Redacted]

GRAND JURY FOREPERSON

MARK A. TOTTON
United States Attorney



NILS R. KESSLER
Assistant United States Attorney